

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO

IN RE: * CASE NO. 09-41986
*
MARK QUIGLEY and *
JILL QUIGLEY * CHAPTER 13
*
*
Debtors * HONORABLE KAY WOODS
*

DEBTORS' RESPONSE TO
OBJECTION TO DEBTORS' PLAN BY GMAC MORTGAGE LLC

Now come the debtors, Mark Quigley and Jill Quigley, in response to the Objection to Debtors' Plan by GMAC Mortgage LLC, and oppose the relief demanded by GMAC Mortgage LLC (the "Creditor") on the grounds that:

1. Creditor claims to be a secured creditor but does not identify a debt or security interest upon which it bases that claim; and
2. Debtors are not indebted to the Creditor.

WHEREFORE, Debtors pray that the Objection to Debtors' Plan by GMAC Mortgage LLC be overruled and that Creditor be denied any claim, secured or otherwise.

Respectfully submitted,

/s/ William Anthony Myers
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Certificate of Service

The foregoing was served this July 15, 2009 as follows:

By USPS Regular Mail:

Mark Quigley
6827 Pinebrooke Court
Youngstown, Ohio 44515

Jill Quigley
6827 Pinebrooke Court
Youngstown, Ohio 44515

By electronic transmission via the Court's CM/ECF system to the following who are listed on the Court's Electronic Mail Notice List:

Joel K. Jensen, Counsel for GMAC Mortgage LLC

Michael A. Gallo, Standing Chapter 13 Trustee

United States Trustee

/s/ William Anthony Myers
WILLIAM A. MYERS (0061476)
Co-Counsel for Debtors